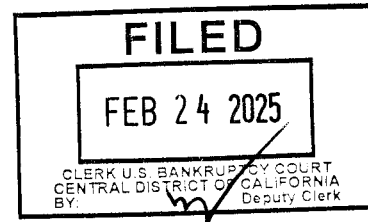


ROUZANNA EGIAN
P.O. Box 10222
Marina Del Rey Ca 90295
(818) 717 3000
SouzanPaladin@me.com



Creditor, In Pro Per

UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION	
IN RE: Debtor CH: 13	<u>CREDITOR ROUZANNA EGIAN'S MOTION TO DISMISS DEBTOR'S CHAPTER 13 ON THE GROUND OF FRAUD AND CONCEALMENT OF ASSETS:</u>
CASE NO. 2:24-bk-10918-VZ	<u>PURSUANT: 11 USC & 523 (A) (2) / 11 USC & 727 9A) (2) / 11 USC (A) (3) / 11 USC (a) (4)</u>
PALADIN, JOHN JOSEPH	<u>CREDITOR'S DECLARATION IN SUPPORT OF MOTION</u> COURTROOM: 1368 HONORABLE ZURZOLO 255 East Temple Street. Los Angeles, CA DATE: MARCH 17, 2025 TIME: 10 : 00 AM

To this court and to Honorable Judge Zarzulo, Creditor, Rouzanna Egian here after "Creditor" (also A.K. A. Paladin) hereby requests that the debtor John Paladin's hereafter "Debtor" chapter 13 Bankruptcy action be dismissed in its entirety for fraudulent transfers and for concealment of assets PURSUANT: 11 USC & 523 (A) (2) / 11 USC & 727 9A) (2) / 11 USC (A) (3) / 11 USC (a) (4)

Debtor have provided contradictory statements under penalty of perjury in state and bankruptcy courts. The creditor requests from this court to hold the Debtor in contempt of court for intentional concealment of assets. Debtor liquidated and concealed over \$676.000 assets from two Dronfield condos alone.

1. Private party alleged loans against Dronfield Condos in the amount \$120.000 and \$50.000 totaling \$170.000 are suspicious. None of the funds were seen in his account in all his declaration of disclosures. Thus this Court should consider those private party loans void.

No recorded deed was found for \$50.000 additional lien.

EXHIBIT: 1. Private party loan recorded against 13040 Dronfield # 16 for \$120.000

2. Creditor requests for dismissal due to concealment of his TRUST account.

EXHIBIT: 2. DEBTORS: TRUST MODIFICATION reflecting mutual funds, stocks and cash.

3. Creditors request for dismissal due to Debtor's concealment of assets from fathers probate estate. Despite Trustee repeat requests and per code of bankruptcy procedure Debtor failed to show assets received from fathers estate. where the debtor was the conservator and only heir to the estate: Humboldt superior Court: Case Number: PR14094 Debtor was barred to act as per his fathers letter.

EXHIBIT: 3. FATHERS JOSEPH PALADIN'S LETTER

4. Creditors request for dismissal due to concealment of six (6) real estate properties in Croatia inherited after the passing of his father.

EXHIBIT: 5. CROATIA MINISTRY OF JUSTICE LAND REGISTRY OFFICE RECORDS.

5. Creditors request for dismissal due to concealment of Wells Fargo, Bank of America and City Business bank accounts.

EXHIBIT: 6. WELLS FARGO bank NINE ACCOUNTS

6. Creditors request to declare VOID and NULL the fraudulent transfer of the 13050 Dronfield Ave # 6 Sylmar by Debtor to his mother Marilyn Paladin. Moreover, proceeds are not accounted for nor reflected in any of the listed bank accounts. Debtor's allegation, that funds were used to pay for his fathers conservatorship, is false, as per Humboldt County Superior court clerk's letter, conservatorship was closed and nothing was filed ever since January 2022. Condo transfer per attached deed was done 8 months later in August 2022.

EXHIBIT: 7. TRANSFER OF CONDO FOR \$330.000 FROM DEBTOR TO HIS MOTHER MARILYN PALADIN

EXHIBIT: 8. CLERKS EMAIL FROM SUPERIOR COURT OF HUMBOLDT COUNTY CONFIRMING THAT NOTHING WAS FILED AFTER JANUARY 2022. REGISTER OF ACTION.

7. Creditor's request for dismissal due to debtor's embezzlement of HOA funds and concealment of those funds from his accounts in both bankruptcy and state courts.

EXHIBIT: 9. POLICE REPORT

EXHIBIT: 10. HOA BOARD LETTER TO TRUSTEE NANCY CURRY

EXHIBIT: 11. CLAIM APPROVAL OF \$52.000 EMBEZZLED HOA FUNDS

EXHIBIT: 12. CHECKS PAID TO DEBTOR BY DEBTOR USING HOA FUNDS.

8. Creditor seeks for dismissal due to fraudulent claims made from debtor's wife XIANGLAN HU. Despite Xianglan Hu in her own divorce case declaration, case number BD 609336 and statement to Chino Police had no income. She has no residency, does not speak English, does not have skills. Moreover her declared income including debtor's income is \$24.000 per subpoenaed documents from SC Edison. Her only and last known job was prostitution per attached exhibits.

EXHIBIT: 13. XIANGLAN LOW INCOME APPLICATION FOR SUBSIDISED UTILITIES

EXHIBIT: 14. POLICE REPORT FOR ARREST FOR DISORDERLY CONDUCT:
PROSTITUTION:
EXHIBIT: 15. CITY OF CHINO COUNCIL MEETING ORDERS REVOKING
BUSINESS LICENSE DUE TO XIANGLAN HU USING A MASSAGE BUSINESS FOR
PROSTITUTION.

9. Credits request to dismiss fraudulent claims made by debtor's mother Marilyn Mineo Paladin due to the fact that she always had a joint account with the Debtor son and failed to disclose to this court. Between mother and son they had 3 bankruptcies and siphon money back and forth.

EXHIBIT: 16. JOINT ACCOUNT OF MOTHER MARILIN PALADIN WITH THE
DEBTOR PALADIN

10. Creditor seeks dismissal due to concealment of Merrill Lynch brokerage account with over \$1,000,000 in assets

EXHIBIT: 17. DECLARATION OF RON MINEO, DEBTOR'S MATERNAL
UNCLE RON MINEO. GRANDMOTHER AND FAMILY AGAINST JOHN PALADIN FOR UNDUE
INFLUENCE. CASE NUMBER: BP 023624

11. Debtor failure to disclose multiple EIN and FEIN numbers that he uses.

12. Creditor request an Order for debtor vacate and surrender community property and interest to Creditor. Since the creditor is the large secured and unsecured lien holder.

That this Court dismiss Chapter 13 and grant any and all available relief the Court deems necessary and appropriate actions for debtor's deception and misleading conduct. Debtor is officer of court, attorney of law and is engaged in misleading multiple courts and creditors. This court should review the debtor's conduct and if warranted impose sanctions.

PRIOR COURT FINDINGS, COURT ORDERS

13. On June 20, 2018, Petitioner was ordered to pay \$6,000.00 toward Respondent's attorney fees and costs for his conduct in this matter.

On December 18, 2019, Judge Rosen found that Petitioner has not complied with the California Code of Civil procedure as to discovery.

The Court finds that that petitioner has not complied with the California Family Code with respect to his fiduciary duties of disclosure to the respondent.

The court finds that the Petitioner has not complied with the Court's discovery orders.

The court finds the Respondent has been diligent.

14. On December 24, 2019, Judge Rosen sanctioned Petitioner in the amount of \$3,500.00 for discovery violations pursuant to FC §271. As an attorney with California State Bar Petitioner is in violation of state bar rules, as to this day he have not self-reported the sanction to State Bar, which mandates any sancion over \$500.00 to be self-reported.

December 17, 2020, RFO hearing Petitioner was ordered to cooperate with appraisals on real properties. To date he has failed and refused to comply with these orders.

December 14, 2021, Petitioner was ordered to provide tax returns and FEINs. To date he has failed and refused to comply with these orders.

15. John Paladin was ordered to pay \$1250.00 the cost of removal of unlawfully recorded lis pendens against Respondent's properties

Trial court on June 30, 2024 ruled that John Paladin had breached his fiduciary duties. "The court noted in its analysis the credibility of the parties, taking into consideration their testimony and other things. As the Court noted throughout the hearings, it frequently did not find Petitioner to be credible. His testimony was frequently at odds with the written exhibits, he would speak in broad generalizations, he was evasive and at times he would even contradict himself The Court found the Respondent to be credible. She did not try to go out on a limb with her testimony and it was frequently corroborated by exhibits or orders"

16 Debtor is a tax attorney and during the marriage, treated marriage as business and wife as a client and has charged her over \$100,000 in attorney fees. Debtor is in contempt of two state court orders for failure to provide tax returns, failure to provide access for appraisals and provide EIN/ FEIN numbers.

EXHIBIT: 18. SEVERAL SANCTIONS FROM THE STATE COURT AGAINST DEBTOR.

DEBTOR' PRIOR PERJURIES:

17. In 1993 Debtor as an attorney placed grandfather Sam Mineo's Murietta home into Trust and he prepared the transfer deed and notarized as well. Yet When applied for conservatorship for Sam debtor concealed all assets of grandfather in order to evade oversight. In front of assets he wrote n/a despite assets being approximately two millions. Later he forged the will and trust and took over all the assets for himself canceling the prior Trust and depriving all four children of Sam Mineo.

EXHIBIT: 19 MURRIETA DEED TRANSFER TO TRUST

EXHIBIT: 20. CONSERVATORSHIP APPLICATION

EXHIBIT: 21 DEBTOR PREPARED A WILL AND NAMED HIMSELF ONLY BENEFICIARY OF THE TRUST AND NOTARIZED HIMSELF AS WELL.

EXHIBIT: 22 DEBTOR NAMED HIMSELF TRUSTEE AS WELL AND NOTARIZED

18. In 2002 while married and was living carefree at Ms. Egan's home and in order to hide his assets and large cash out refi he have perjured himself signing Trust Deed for \$280,000 as a "SINGLE MAN AS HIS SOLE AND SEPARATE "

EXHIBIT: 23. MURRIETA CASH OUT REFI TRUST DEED SIGNED AS SINGLE MAN WHILE MARRIED.

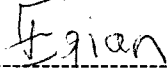
19. John Paladin has purchased two Dronfield condos under his name using father's conservatorship assets, thus committing theft per Conservatorship court code of 2112. He was listing the same assets in his 2016 and 2017 tax returns as his investment properties. After divorce filing he claimed

that the condos belonged to his father and in 2018 and 2019 tax returns the condos disappeared. He was committing perjury.

EXHIBIT: 24 DEBTORS 2016, 2017 , 2018 AND 2019 SCHEDULE E.

EXHIBIT; 25 PURCHASE DEED OF DRONFIELD AS JOHN PALADIN'S SOLE AND SEPARATE WHILE FUNDS WERE FROM CONSERVATORSHIP

Based on the evidence and information provided Creditor preys to this court that Debtor's chapter 13 to be dismissed. This case must be continued in the state court, where attorney fees, spousal support, misappropriated \$500.000 from Summer Grove property and other community expenses are still an issue. Family court will resume the evidentiary hearing on April 18, 2025 after the Federal courts verdict.



Rouzanna Eglan Creditor in pro per

Date: 2/19/2025

Marina Del Rey

EXHIBIT: 1

This page is part of your document - DO NOT DISCARD



20191405786



Pages:
0005

Recorded/Filed in Official Records
Recorder's Office, Los Angeles County,
California

12/17/19 AT 09:57AM

FEES:	56.00
TAXES:	0.00
OTHER:	0.00
SB2:	150.00
PAID:	206.00



LEADSHEET



201912170750007

00017624366



010373100

SEQ:
01

DAR - Counter (Upfront Scan)



THIS FORM IS NOT TO BE DUPLICATED

RECORDING REQUESTED BY

John Paladin, Esq.
Box 801777
Valencia, CA 91380

AND WHEN RECORDED MAIL TO

Vincent and Lisa Chaney
30707 Davey Jones Drive
Agoura, CA 91301-1925

**DEED OF TRUST
WITH ASSIGNMENT OF RENTS AS ADDITIONAL SECURITY**

This DEED OF TRUST, made Dec. 13, 2019, between John Paladin

herein called TRUSTOR,
whose address is Box 801777, Valencia, CA 91380

FIDELITY NATIONAL TITLE COMPANY, a California Corporation, herein called TRUSTEE, and

Vincent and Lisa Chaney, herein called BENEFICIARY,
Trustor irrevocably grants, transfers and assigns to Trustee in Trust, with Power of Sale that property in
Los Angeles County California, described as:

13050 Dronfield Av., #6, Sylmar, CA 91342. APN 2509-020-189. Please see attached legal description. Exhibit A

Together with the rents, issues and profits thereof, subject, however, to the right, power and authority
hereinafter given to and conferred upon Beneficiary to collect and apply such rents, issues and profits.

For the Purpose of Securing (1) payment of the sum of \$ 120,000.00 with interest thereon
according to the terms of a promissory note or notes of even date herewith made by Trustor, payable to order of
Beneficiary, and extensions or renewals thereof; (2) the performance of each agreement of Trustor incorporated
by reference or contained herein or reciting it is so secured; (3) Payment of additional sums and interest thereon
which may hereafter be loaned to Trustor, or his successors or assigns, when evidenced by a promissory note or
notes reciting that they are secured by this Deed of Trust.

To protect the security of this Deed of Trust, and with respect to the property above described, Trustor
expressly makes each and all of the agreements, and adopts and agrees to perform and be bound by each and all
of the terms and provisions set forth in subdivision A of that certain Fictitious Deed of Trust referenced herein,
and it is mutually agreed that all of the provisions set forth in subdivision B of that certain Fictitious Deed of
Trust



Summons and Subpoenas Department
PO Box 29728 S4001-01F
Phoenix, AZ 85038
Voice: 480-724-2000

November 10, 2023

Rouzanna Paladin, In pro per
Rouzanna Paladin
PO Box 10222
Marina Del Rey, CA 90295

Subject: Legal Order Received: 10/18/2023
Case Name: John Paladin vs Rouzanna Egian Paladin
Case Number: 17CHFL01344
Bank Reference Number: 28674381

Dear Rouzanna Paladin

We are in receipt of the subpoena served on Wells Fargo Bank, N.A. for documents pertaining to the above referenced number. Pursuant to that subpoena, please see the enclosed document for a listing of records delivered with this letter.

Funds transfer and automated clearing house (ACH) information is reflected on account statements. If you require more detailed information regarding these types of transactions, please contact us.

Our research for records is limited to accounts relating to only Wells Fargo Bank, N.A.

This constitutes the final response from the Summons & Subpoena Processing Department of Wells Fargo Bank, N.A. to your subpoena and this matter.

If you have questions, please call us at 480-724-2000, Monday – Friday, 8:00 a.m. to 8:00 p.m. Eastern Time.

Thank you.

Deposit and Legal Services
Summons and Subpoenas Department

EXHIBIT: 2

MODIFICATION OF TRUST OF JOHN PALADIN

I, John Paladin, modify my inter vivos trust as follows.

John Paladin of Los Angeles County, California, called trustor, has already transferred and delivered to John Paladin, trustee, all of my real and personal property to constitute, together with any other property that may become subject to this trust, the trust estate, to be held, administered and distributed by trustee as provided in this modification of trust and as provided in the will which is executed on November 28, 1999. John Paladin is the initial trustee and beneficiary for life.

Trustee shall have the right at any time to add other property to this trust and such property shall become part of the trust estate.

On legal incapacity or death of trustor, this trust cannot be amended by anyone else on behalf of trustor John Paladin.

Trustor John Paladin is trustee of this trust for the life of John Paladin. Trustee will serve without bond or other security. In the event of the failure or resignation of John Paladin to act as trustee then I appoint my mother Marilyn Paladin as alternate trustee who will serve without bond. In the event she shall fail or cease to act as trustee then the next alternate trustee is Rouzanna Egian to serve without bond.

The initial trust beneficiary is John Paladin for life. After the death of John Paladin the trust principal will be distributed as follows.

Ten percent of the total value of my estate I leave to Rouzanna Egian.

The property on Kester Avenue I leave to Marilyn Paladin.

The house on Murietta Avenue and my cash and stocks are to be divided between Marilyn Paladin and Joseph C. Paladin. The money Joe Paladin owes me is to be treated as a predistribution of his share of my estate.

All of my furniture, personal possessions, paperwork, financial papers, closed case files and personal effects of Samuel H. Mineo, including his records, recordings, books, manuscripts and creative works are given to Marilyn Paladin.

I disinherit Joseph Ronald Mineo, Roberta Mineo Allen, Elizabeth Mineo Ruff and

John Paladin, 113.892
Attorney And Counselor At Law
4801 Murietta Avenue
Sherman Oaks, California 91423-1910
Phone: (818) 784-7777. Fax: (818) 784-7778

1 all of their children and heirs.

2 I intentionally am not providing for anyone else. Anyone else who makes a claim
3 to inherit any part of my estate is not to receive more than one dollar.

4 Anyone who contests my estate plan is disinherited.

5 During the life of trustor John Paladin, trustee shall pay to or apply for benefit
6 of beneficiary in monthly or other convenient installments all of the net income, if any,
7 from the trust estate. Trustee may in his or her discretion pay to or apply for the
8 benefit of the beneficiary in addition to the net income of the trust estate, such
9 amount from the principal of the trust estate up to the whole thereof as trustee may
10 deem necessary and appropriate for the normal care, comfort and support of the
11 beneficiary.

12 Executrix, executor and/or trustee shall have broad management powers to hold
13 assets in the form received and to make and to hold investments which are not
14 diversified, subject only to confirmation required by law, if any.

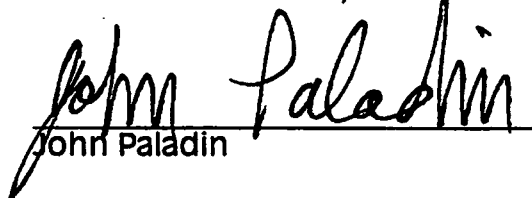
15 Trustee has the power to buy, sell and encumber real estate and buy, sell and
16 encumber other assets, including stocks and bonds.

17 The successor trustee after John Paladin is not allowed to buy, sell or trade in
18 stock market puts, calls, options, commodities, junk bonds or any highly speculative
19 investments.

20 All rights and duties under this trust shall be governed by and interpreted under
21 the law of the State of California.

22 Should any provision of this trust be or become invalid or unenforceable, the
23 remaining provisions of this trust shall continue to be fully effective.

24 Dated November 28, 1999 in Sherman Oaks, California.

25 
26 John Paladin
27
28

M_John Paladin.12B. Modification of trust on pleading paper.

EXHIBIT: 3

8 October 2003

John Paladin
Attorney And Counselor At Law
Post Office Box 33785
Granada Hills, Ca 91394-3785

RE: Your letter and Fax dated 9/22/03


Regarding " Frank Earle Mitchell Bills"

Dear John Paladin,

I do not trust you. I do not want to work with you nor associate with you. Therefore I prohibit and forbid you to act as my representative in any capacity, particularly as my attorney or relative. I also forbid you to sign my name or sign on my behalf

Furthermore, I herewith expressly revoke any and all licenses ever given to you by me including any powers of attorney or association, express or implied. Henceforth, leave me out of your business and social plans.

Sincerely,


Joseph C. Paladin
P.O. Box 388
Trinidad, CA 95570
FAX (707) 677-1900
Phone (707) 677-1907

CERTIFIED MAIL, Return Receipt Requested

EXHIBIT : 4

Daisy Sheard

Humboldt Superior Court Research Request

May 3, 2024 at 10:16:43

souzanpaladin@me.com

Hello, Humboldt Superior Court has received your research request for PRI40194 for anything filed after March 2022. There has not been anything filed since March 2022.

Thank you.

Daisy Sheard (she/her, they/them)

Deputy Clerk I

Humboldt Superior Court, Civil Division

Confidentiality Notice: This e-mail communication and any attachments may contain confidential and privileged information for the use of the designated recipients named above. It is unauthorized review, use, disclosure or dissemination is prohibited. If you are not the intended recipient, please inform the sender by e-mail, delete the original message and destroy all copies.

EXHIBIT: 5



REPUBLIKA HRVATSKA

Općinski sud u Crikvenici
ZEMLJIŠNOKNJIŽNI ODJEL NOVI VINODOLSKI
Stanje na dan: 24.06.2024. 08:42

Verificirani ZK uložak

Katastarska općina: 302678, NOVI

Broj ZK uložka: 4017

Broj zadnjeg dnevnika: Z-7066/2019

Aktivne plombe:

IZVADAK IZ ZEMLJIŠNE KNJIGE

**POSEBNI IZVADAK: KAT. ČESTICE: 5847/3, 5847/520, 5847/521, 5847/643, 5847/658, 5847/660 (OSTALO
KAO NEPOTREBNO IZOSTAVLJENO)**

A
Posjedovnica
PRVI ODJELJAK

Rbr.	Broj zemljišta (kat. čestice)	Oznaka zemljišta	Površina			Primjedba
			jutro	čhv	m2	
1.	5847/3	GRADILIŠTE BRIBIRSKA OBALA			591	
2.	5847/520	CESTA BRIBIRSKA OBALA		102	367	
3.	5847/521	ZELENI POJAS BRIBIRSKA OBALA		28	101	
4.	5847/643	PUT BRIBIRSKA OBALA		11	40	
5.	5847/658	GRADILIŠTE BRIBIRSKA OBALA		9	32	
6.	5847/660	ZELENI POJAS BRIBIRSKA OBALA			303	
		UKUPNO:		150	1434	

B
Vlastovnica

Rbr.	Sadržaj upisa	Primjedba
2. Suvlasnički dio: 1/2		
	PALADIN JOSEPH CYRIL, OIB: 49614463051, 2780 TIMBER RIDGE LANE EUREKA, CA 95503, SAD	
3. Suvlasnički dio: 1/2		
	PALADIN ALICE H, OIB: 35094862193, 18768 HIGHWAY FF 000, MEXICO, MISSOURI 65265, SAD	

C
Teretovnica

Rbr.	Sadržaj upisa	Iznos	Primjedba
Tereta nema!			

Potvrđuje se da ovaj izvadak odgovara stanju zemljišne knjige na datum 24.06.2024.

Izvadak je upisan pod brojem 22918/2024

IZVADAK IZ ZEMLJIŠNE KNJIGE

Katastarska općina: 302678, NOVI

Verificirani ZK uložak
Broj ZK uložka: 4017

POSEBNI IZVADAK: (OSTALO KAO NEPOTREBNO IZOSTAVLJENO)

Izdao:

ZK referent:
MILENA JOVANOVIĆ



Kontrolni broj: Z162601576e77dcbf

**EXCERPT FROM THE LAND
REGISTER**

Verified land register file

Cadastral Municipality: 302678,
NOVI

Land register file number: 4017

SPECIAL EXCERPT: (OTHER OMITTED AS UNNECESSARY)

**B
Property Ownership Certificate**

Ser. No.	Subject of issuance	Entry content	Note
*1. Ownership share: 1/1			
*PALADIN ANA, UD. FRANKA, 1137 ROSEWOOD WAY, ALAMEDA, USA			Printed by: Z-10197/2019
*1.1	Z-10197/2019	FROM LAND REGISTER FILE TRANSFERRED OWNERS	
*2.1.	Z-50/2013	Received on: 02/18/2008 Z-175/08 Based on the proposal dated February 18, 2008, and the lawsuit received by this court under P-463/05 on July 18, 2005, a dispute is recorded on the property of Ana Paladin, cadastral plot number 5847/57, which is being litigated in this court under P-463/05 in the legal matter of the plaintiffs Josip Bažok and Margareta Bažok, both from Novi Vinodolski, Primorska 52, regarding the determination of ownership rights.	
*2.2.	Z-10197/2019	Received on 01/15/2013, number Z-50/13 Based on the Court Judgement numbered P-463/05 dated October 29, 2007, the dispute record registered under Z-175/08 is deleted.	
2. Co-ownership share: 1/2			
2.3		Received on 07/26/2019 under number Z-10197/2019 REGISTRATION, OWNERSHIP RIGHT, INHERITANCE DECISION OF THE NOTARY PUBLIC, JELENA TUS, FROM NOVI VINODOLSKI, ADDRESS: KORZO VINODOLSKOG ZAKONA 50A, AS THE COURT COMMISSIONER OF THE MUNICIPAL COURT IN CRIKVENICA, PROTOCOL NO. 0-3649/2016, UPP/OS-55/18 06/18/2019, ownership rights are registered on the property of Ana Paladin, maiden name Mudrovčić, in A, for the benefit of: PALADIN JOSEPH CYRIL, ID: 49614463051, 2780 TIMBER RIDGE LANE EUREKA, CA 95503, USA	on 1 (1.1)
3. Co-ownership share: 1/2			
3.1		Received on 07/26/2019 under number Z-10197/2019 REGISTRATION, OWNERSHIP RIGHT, INHERITANCE DECISION OF THE NOTARY PUBLIC, JELENA TUS, FROM NOVI VINODOLSKI, ADDRESS: KORZO VINODOLSKOG ZAKONA 50A, AS THE COURT COMMISSIONER OF THE MUNICIPAL COURT IN CRIKVENICA, PROTOCOL NO. 0-3649/2016, UPP/OS-55/18 06/18/2019, ownership rights are registered on the property of Ana Paladin, maiden name Mudrovčić, in A, for the benefit of: PALADIN ALICE H, ID: 35094862193, 18768 HIGHWAY FF 000, MEXICO, MISSOURI 65265, USA	on 1 (1.1)

**C
Property Encumbrance Certificate**

Ser. No.	Subject of issuance	Entry content	Amount	Note
No encumbrances!				

It is confirmed that this excerpt corresponds to the status at the land register as at 06/24/2024.

The excerpt is registered under the number 22923/2024



REPUBLIC OF CROATIA
Municipal Court in Crikvenica
LAND REGISTRY DEPARTMENT AT NOVI VINODOLSKI
Status as at: 06/24/2024 08:42 AM

Verified land register file

Cadastral Municipality: 302678, NOVI

Land register file number: 4017

Last log number: Z-7066/2019

Active seals:

EXCERPT FROM THE LAND REGISTER

SPECIAL EXCERPT: CADASTRAL PLOTS: 5847/3, 5847/520, 5847/521, 5847/643, 5847/658, 5847/660 (OTHER OMITTED AS UNNECESSARY)

A
Property Possession Certificate
FIRST SECTION

Ser. No.	Land number (cadastral plot)	Land designation	Area			Note
			acre	square fathom	Sqaure meter (m2)	
1.	5847/3	CONSTRUCTION SITE AT BRIBIRSKA OBALA			591	
2.	5847/520	ROAD AT BRIBIRSKA OBALA		102	367	
3.	5847/521	GREEN ZONE AT BRIBIRSKA OBALA		28	101	
4.	5847/643	PATH AT BRIBIRSKA OBALA		11	40	
5.	5847/658	CONSTRUCTION SITE BRIBIRSKA OBALA		9	32	
6.	5847/660	GREEN ZONE BRIBIRSKA OBALA			303	
		TOTAL:		150	1434	

B
Property Ownership Certificate

Ser. No.	Entry content	Note
2.	Co-ownership share: 1/2	
	PALADIN JOSEPH CYRIL, ID: 49614463051, 2780 TIMBER RIDGE LANE EUREKA, CA 95503, USA	
3.	Co-ownership share: 1/2	
	PALADIN ALICE H, ID: 35094862193, 18768 HIGHWAY FF 000, MEXICO, MISSOURI 65265, USA	

C
Property Encumbrance Certificate

Ser. No.	Entry content	Amount	Note
	No encumbrances!		

It is confirmed that this excerpt corresponds to the status at the land register as at 06/24/2024.

The excerpt is registered under the number 22918/2024

EXHIBIT : 6



Summons and Subpoenas Department
PO Box 29728 S4001-01F
Phoenix, AZ 85038
Voice: 480-724-2000

November 10, 2023

Rouzanna Paladin, In pro per
Rouzanna Paladin
PO Box 10222
Marina Del Rey, CA 90295

Subject: Legal Order Received: 10/18/2023
Case Name: John Paladin vs Rouzanna Egian Paladin
Case Number: 17CHFL01344
Bank Reference Number: 28674381

Dear Rouzanna Paladin

We are in receipt of the subpoena served on Wells Fargo Bank, N.A. for documents pertaining to the above referenced number. Pursuant to that subpoena, please see the enclosed document for a listing of records delivered with this letter.

Funds transfer and automated clearing house (ACH) information is reflected on account statements. If you require more detailed information regarding these types of transactions, please contact us.

Our research for records is limited to accounts relating to only Wells Fargo Bank, N.A.

This constitutes the final response from the Summons & Subpoena Processing Department of Wells Fargo Bank, N.A. to your subpoena and this matter.

If you have questions, please call us at 480-724-2000, Monday – Friday, 8:00 a.m. to 8:00 p.m. Eastern Time.

Thank you.

Deposit and Legal Services
Summons and Subpoenas Department

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): ROUZANNA PALADIN Post Office Box 10222 Marina Del Rey, CA 90295 TELEPHONE NO: (818) 717-3000 FAX NO: E-MAIL ADDRESS:		SUBP-002 FOR COURT USE ONLY
ATTORNEY FOR (Name) Respondent, In Pro Per NAME OF COURT: SUPERIOR COURT OF CALIFORNIA STREET ADDRESS: 9425 Penfield Avenue MAILING ADDRESS: 9425 Penfield Avenue CITY AND ZIP CODE: Chatsworth, CA 91311 BRANCH NAME: NORTH VALLEY DISTRICT		
PLAINTIFF/PETITIONER: JOHN PALADIN		
DEFENDANT/RESPONDENT: ROUZANNA EGIAN PALADIN		
CIVIL SUBPOENA (DUCES TECUM) for Personal Appearance and Production of Documents, Electronically Stored Information, and Things at Trial or Hearing and DECLARATION		CASE NUMBER: 17CHFL01344

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of witness, if known):

The Custodian of Records for Wells Fargo Bank, N.A.
Post Office Box 29728, Phoenix, AZ 85038

1. YOU ARE ORDERED TO APPEAR AS A WITNESS in this action at the date, time, and place shown in the box below UNLESS your appearance is excused as indicated in box 3b below or you make an agreement with the person named in item 4 below.

a. Date: 11/13/2023 Time: 8:30am ☒ Dept: 21 ☐ Div.: ☐ Room:
b. Address: 111 No. Hill Street, Los Angeles, CA 90012

2. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.
3. YOU ARE (item a or b must be checked):
- a. ☐ Ordered to appear in person and to produce the records described in the declaration on page two or the attached declaration or affidavit. The personal attendance of the custodian or other qualified witness and the production of the original records are required by this subpoena. The procedure authorized by Evidence Code sections 1580(b), 1581, and 1582 will not be deemed sufficient compliance with this subpoena.
- b. ☒ Not required to appear in person if you produce (i) the records described in the declaration on page two or the attached declaration or affidavit and (ii) a completed declaration of custodian of records in compliance with Evidence Code sections 1580, 1581, 1582, and 1271. (1) Place a copy of the records in an envelope (or other wrapper). Enclose the original declaration of the custodian with the records. Seal the envelope. (2) Attach a copy of this subpoena to the envelope or write on the envelope the case name and number; your name; and the date, time, and place from item 1 in the box above. (3) Place this first envelope in an outer envelope, seal it, and mail it to the clerk of the court at the address in item 1. (4) Mail a copy of your declaration to the attorney or party listed at the top of this form. ROUZANNA PALADIN
4. IF YOU HAVE ANY QUESTIONS ABOUT THE TIME OR DATE YOU ARE TO APPEAR, OR IF YOU WANT TO BE CERTAIN THAT YOUR PRESENCE IS REQUIRED, CONTACT THE FOLLOWING PERSON BEFORE THE DATE ON WHICH YOU ARE TO APPEAR:

- a. Name of subpoenaing party or attorney: Rouzanna Paladin b. Telephone number: (818) 717-3000
5. Witness Fees: You are entitled to witness fees and mileage actually traveled both ways, as provided by law, if you request them at the time of service. You may request them before your scheduled appearance from the person named in item 4.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF ONE THOUSAND DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued:

1/16/2022



B. King

(SIGNATURE OF PERSON ISSUING SUBPOENA)

(Declaration in support of subpoena on reverse)

(TITLE)

Form Adopted for Mandatory Use
Judicial Council of California
SUBP-002 (Rev. January 1, 2012)

CEB Essential

CIVIL SUBPOENA (DUCES TECUM) for Personal Appearance and Production of Documents, Electronically Stored Information, and Things at Trial or Hearing and DECLARATION

Page 1 of 3

Code of Civil Procedure,
§ 1985 et seq
www.court.ca.gov

PLAINTIFF/PETITIONER: JOHN PALADIN	CASE NUMBER: 17CHFL01344
DEFENDANT/RESPONDENT: ROUZANNA EGIAN PALADIN	

The production of the documents, electronically stored information, or other things sought by the subpoena on page one is supported by (check one):

☐ the attached affidavit or ☒ the following declaration:

DECLARATION IN SUPPORT OF CIVIL SUBPOENA (DUCES TECUM) FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND THINGS AT TRIAL OR HEARING
(Code Civ. Proc., §§ 1985, 1987.5)

1. I, the undersigned, declare I am the ☐ plaintiff ☐ defendant ☐ petitioner ☒ respondent
☐ attorney for (specify):
in the above-entitled action.
2. The witness has possession or control of the documents, electronically stored information, or other things listed below, and shall produce them at the time and place specified in the Civil Subpoena for Personal Appearance and Production of Records at Trial or Hearing on page one of this form (specify the exact documents or other things to be produced; if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):

☒ Continued on Attachment 2.

3. Good cause exists for the production of the documents, electronically stored information, or other things described in paragraph 2 for the following reasons:
Said documents and records are not otherwise available to requesting party.

☐ Continued on Attachment 3.

4. The documents, electronically stored information, or other things described in paragraph 2 are material to the issues involved in this case for the following reasons:
Said documents and records reflect the assets and income of Petitioner which such information is material to issues to be tried by the Court.

☐ Continued on Attachment 4.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 10/5/23

ROUZANNA PALADIN

(TYPE OR PRINT NAME)

(SIGNATURE OF

☒ SUBPOENAING PARTY

☐ ATTORNEY FOR
SUBPOENAING PARTY)

Request for Accommodations

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least five days before the date on which you are to appear. Contact the clerk's office or go to www.courts.ca.gov/forms for Request for Accommodations by Persons With Disabilities and Response (form MC-410). (Civil Code, § 54.8.)



(Proof of service on page 3)

SUBP-002 (Rev. January 1, 2012)

CEB Essential
Forms

**CIVIL SUBPOENA (DUCES TECUM) for Personal Appearance and
Production of Documents, Electronically Stored Information, and Things at
Trial or Hearing and DECLARATION**

Page 2 of 3

PLAINTIFF/PETITIONER: JOHN PALADIN	CASE NUMBER: 17CHFL01344
DEFENDANT/RESPONDENT: ROUZANNA EGIAN PALADIN	

SUBP-002

PROOF OF SERVICE OF CIVIL SUBPOENA (DUCES TECUM) for Personal Appearance and Production of Documents, Electronically Stored Information, and Things at Trial or Hearing and DECLARATION

1. I served this *Civil Subpoena (Duces Tecum)* for Personal Appearance and Production of Documents, Electronically Stored Information, and Things at Trial or Hearing and Declaration by personally delivering a copy to the person served as follows:
 - a. Person served (name):
 - b. Address where served:
 - c. Date of delivery:
 - d. Time of delivery:
 - e. Witness fees (check one):
 - (1) ☐ were offered or demanded and paid. Amount: _____ \$
 - (2) ☐ were not demanded or paid.
 - f. Fee for service: _____ \$
2. I received this subpoena for service on (date):
3. Person serving:
 - a. ☐ Not a registered California process server.
 - b. ☐ California sheriff or marshal.
 - c. ☐ Registered California process server.
 - d. ☐ Employee or independent contractor of a registered California process server.
 - e. ☐ Exempt from registration under Business and Professions Code section 22350(b).
 - f. ☐ Registered professional photocopy.
 - g. ☐ Exempt from registration under Business and Professions Code section 22451.
 - h. Name, address, telephone number, and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

(SIGNATURE)

(SIGNATURE)

**ATTACHMENT "2" TO CIVIL SUBPOENA (DUCES TECUM) FOR PERSONAL
APPEARANCE AND PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED
INFORMATION, AND THINGS AT TRIAL OR HEARING**

All records, including electronic records, in the name of JOHN JOSEPH PALADIN (SSN 572-27-8169) (FEIN 95-454-9091) as an individual, corporation, dba, joint account holder, signatory or beneficiary, conservator, trustee, for the period from January 1, 1999, to the date of production, including, but not limited to Account Numbers 6274830527 and 1486140666, to include the following:

I. Checking account records and activity, including but not limited to, signature cards, bank statements, canceled checks, debit and credit memos, deposit tickets and deposited items. These records shall include legible copies of the following:

i) Any and all statements of activity for each account, including but not limited to monthly, quarterly and/or yearly.

ii) Any and all records of transfers of funds, including but not limited to wire transfers, cashier's checks, and electronic transfers.

iii) Any and all income tax records, including but not limited to Forms 1099.

2. Records of savings accounts, certificates of deposits, and other savings instruments by whatever name known, to include applications, signature cards, periodic statements, deposit tickets, items deposited, including but not limited to wire transfers, withdrawal slips, checks issued on those withdrawals, and debit and credit memos to those accounts.

3. Records of accounts held for the benefit of clients, client trust accounts, business accounts, and activity, including but not limited to, signature cards, bank statements, periodic statements, canceled checks, debit and credit memos, deposit tickets and deposited items, withdrawal slips, checks issued on those withdrawals, and debit and credit memos to those accounts. These records shall include legible copies of the following:

i) Any and all statements of activity for each account, including but not limited to monthly, quarterly and/or yearly.

ii) Any and all records of transfers of funds, including but not limited to wire transfers, cashier's checks, and electronic transfers.

iii) Any and all income tax records, including but not limited to Forms 1099.

1 4. Records of accounts held as trustee of the Samuel H. Mineo Trust, and as conservator,
2 including but not limited to conservatee JOSEPH PALADIN as beneficiary, as trustee, and/or as
3 trustor, and activity, including but not limited to, signature cards, bank statements, periodic statements,
4 canceled checks, debit and credit memos, deposit tickets and deposited items, withdrawal slips, checks
5 issued on those withdrawals, and debit and credit memos to those accounts. These records shall include
legible copies of the following:

6 i) Any and all statements of activity for each account, including but not limited to
7 monthly, quarterly and/or yearly.

8 ii) Any and all records of transfers of funds, including but not limited to wire transfers,
9 cashier's checks, and electronic transfers.

10 iii) Any and all income tax records, including but not limited to Forms 1099.

11 5. All documents that reflect or refer to deposits, withdrawals and exchange of funds at this bank
12 or account(s) owned by JOHN JOSEPH PALADIN or standing in his name, individually or jointly
13 with any other PERSON or entity, including MARILYN MINEO PALADIN date of birth February 6,
14 1936 (SSN ending 4708), JOSEPH PALADIN, and XIANG LAN HU, and SAMUEL H. MINEO
TRUST, including, but not limited to the following documents:

15 i) Bank statements;

16 ii) Copies of the front and back of all canceled checks;

17 iii) Copies of the front and back of all cashiers and/or bank checks;

18 iv) Copies of the front and back of all certificates of deposit; and

19 v) Copies of all documents relating to wire transfers and interbank transfers.

20 6. Any and all monthly, quarterly, and/or annual statements regarding the above referenced
accounts from January 1, 1999, to the date of productions.

21 7. Copies of all signature cards or records reflecting rental of any safe deposit box in the name of
22 JOHN JOSEPH PALADIN.

23 8. Correct copies of both sides of all signature cards or account application forms held in
24 connection with any bank account at this bank referred to above.

25 9. All records of loans made to JOHN JOSEPH PALADIN, including loan applications, tax
26 returns, any and all financial statements, lists of assets, employment verification document and credit
27 reports obtained in connection with said loans.
28

1 10. Any and all documents reflecting and/or evidencing any and all loans approved by the witness
2 for and/or on behalf of JOHN JOSEPH PALADIN, and/or any third party and/or entity on his behalf,
3 including but not limited to all documents reflecting and/or evidencing record and method of payment
thereof.

4 11. Any and all documents evidencing ~~and/or~~ reflecting security/collateral tendered by JOHN
5 JOSEPH PALADIN, and/or any third party or entity on his behalf, to secure any loan.

6 12. Any and all documents evidence and/or reflecting loan payments made by JOHN JOSEPH
7 PALADIN and any third party or entity on his behalf for any loan held with the witness during the
8 period of time as set forth herein above.

9 13. Any and all documents evidencing and/or reflecting withdrawals on any credit line by JOHN
10 JOSEPH PALADIN and/or any third party or entity on his behalf, including but not limited to copies
11 of fronts and backs of canceled checks paid from any line of credit held in the name of JOHN JOSEPH
PALADIN and/or any evidence of wire transfers.

12 14. Copies of any and all documents with regard to the sale, purchase, finance, and/or refinance of
13 any property, held by JOHN JOSEPH PALADIN and/or any third party and/or entity on his behalf
14 including:

15 i) Settlement and/or disbursement statements;

16 ii) Copies of fronts and backs of all checks whether made payable to escrow by JOHN
17 JOSEPH PALADIN and/or any third party and/or entity on his behalf;

18 iii) Copy of entire escrow file regarding sale, purchase, finance and/or refinance of any
property;

19 iv) Copies of any notes and/or deeds of trust executed by JOHN JOSEPH PALADIN
20 and/or any third party and/or entity on his behalf;

21 v) Records of any and all payments made by JOHN JOSEPH PALADIN and/or any third
22 party or entity on his behalf;

23 vi) Any and all telephone memos generated by the witness regarding the finances and/or
24 refinance of any amendments to escrow reflecting same;

25 vii) Any and all documents submitted by JOHN JOSEPH PALADIN and/or any third party
26 or entity on his behalf to obtain a loan, including copies of loan applications, appraisals, tax returns,
27 personal and business financial statements regarding the sale, purchase finance and/or refinance of any
28 property, statement of information, tax returns.

SUBP-025

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):		FOR COURT USE ONLY
ROUZANNA PALADIN Post Office Box 10222 Marina Del Rey, CA 90295 TELEPHONE NO.: (818) 717-3000 FAX NO. (Optional): E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Respondent, In Pro Per		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 9425 Penfield Avenue MAILING ADDRESS: 9425 Penfield Avenue CITY AND ZIP CODE: Chatsworth, CA 91311 BRANCH NAME: NORTH VALLEY DISTRICT		CASE NUMBER: 17CHFL01344
PLAINTIFF/PETITIONER: JOHN PALADIN DEFENDANT/RESPONDENT: ROUZANNA EGIAN PALADIN		
NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION (Code Civ. Proc., §§ 1985.3, 1985.6)		

NOTICE TO CONSUMER OR EMPLOYEE

TO (name): JOHN PALADIN

- PLEASE TAKE NOTICE THAT REQUESTING PARTY (name): ROUZANNA PALADIN
SEEKS YOUR RECORDS FOR EXAMINATION by the parties to this action on (specify date): November 13, 2023
The records are described in the subpoena directed to witness (specify name and address of person or entity from whom records are sought): The Custodian of Records for Wells Fargo Bank, N.A., Post Office Box 29728, Phoenix, AZ 85038
A copy of the subpoena is attached.
- IF YOU OBJECT to the production of these records, YOU MUST DO ONE OF THE FOLLOWING BEFORE THE DATE SPECIFIED.
IN ITEM a. OR b. BELOW:
 - If you are a party to the above-entitled action, you must file a motion pursuant to Code of Civil Procedure section 1987.1 to quash or modify the subpoena and give notice of that motion to the witness and the deposition officer named in the subpoena at least five days before the date set for production of the records.
 - If you are not a party to this action, you must serve on the requesting party and on the witness, before the date set for production of the records, a written objection that states the specific grounds on which production of such records should be prohibited. You may use the form below to object and state the grounds for your objection. You must complete the Proof of Service on the reverse side indicating whether you personally served or mailed the objection. The objection should not be filed with the court. **WARNING: IF YOUR OBJECTION IS NOT RECEIVED BEFORE THE DATE SPECIFIED IN ITEM 1, YOUR RECORDS MAY BE PRODUCED AND MAY BE AVAILABLE TO ALL PARTIES.**
- YOU OR YOUR ATTORNEY MAY CONTACT THE UNDERSIGNED to determine whether an agreement can be reached in writing to cancel or limit the scope of the subpoena. If no such agreement is reached, and if you are not otherwise represented by an attorney in this action, YOU SHOULD CONSULT AN ATTORNEY TO ADVISE YOU OF YOUR RIGHTS OF PRIVACY.

Date: October 6, 2023

ROUZANNA PALADIN

(TYPE OR PRINT NAME)

Rouzanna E. Paladin

(SIGNATURE OF ☐ REQUESTING PARTY ☐ ATTORNEY)

OBJECTION BY NON-PARTY TO PRODUCTION OF RECORDS

- ☐ I object to the production of all of my records specified in the subpoena.
- ☐ I object only to the production of the following specified records:
- The specific grounds for my objection are as follows:

Date:

(TYPE OR PRINT NAME)

(Proof of service on reverse)

(SIGNATURE)

Page 1 of 2

SUBP-025

PLAINTIFF/PETITIONER: JOHN PALADIN	CASE NUMBER:
DEFENDANT/RESPONDENT: ROUZANNA EGIAN PALADIN	17CHFL01344

PROOF OF SERVICE OF NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION

(Code Civ. Proc., §§ 1985.3, 1985.6)

☐ Personal Service ☒ Mail

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. I served a copy of the *Notice to Consumer or Employee and Objection* as follows (check either a or b):
 - a. ☐ Personal service. I personally delivered the *Notice to Consumer or Employee and Objection* as follows:
 - (1) Name of person served:
 - (2) Address where served:
 - (3) Date served:
 - (4) Time served:
 - b. ☒ Mail. I deposited the *Notice to Consumer or Employee and Objection* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 - (1) Name of person served: John Paladin
 - (2) Address: PO Box 801777
Valencia, CA 91380
 - (3) Date of mailing: October 7, 2023
 - (4) Place of mailing (city and state):
Simi Valley, CA
 - (5) I am a resident of or employed in the county where the *Notice to Consumer or Employee and Objection* was mailed.
 - c. My residence or business address is (specify): 2345 Erringer Rd., Ste 221, Simi Valley, CA 93065
 - d. My phone number is (specify): (805) 217-3330

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: October 7, 2023

KATHY WOODS

(TYPE OR PRINT NAME OF PERSON WHO SERVED)

(SIGNATURE OF PERSON WHO SERVED)

PROOF OF SERVICE OF OBJECTION TO PRODUCTION OF RECORDS

(Code Civ. Proc., §§ 1985.3, 1985.6)

☐ Personal Service ☐ Mail

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. I served a copy of the *Objection to Production of Records* as follows (complete either a or b):
 - a. ON THE REQUESTING PARTY
 - (1) ☐ Personal service. I personally delivered the *Objection to Production of Records* as follows:
 - (i) Name of person served:
 - (ii) Address where served:
 - (iii) Date served:
 - (iv) Time served:
 - (2) ☐ Mail. I deposited the *Objection to Production of Records* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 - (i) Name of person served:
 - (ii) Address:
 - (iii) Date of mailing:
 - (iv) Place of mailing (city and state):
 - (v) I am a resident of or employed in the county where the *Objection to Production of Records* was mailed.
 - b. ON THE WITNESS
 - (1) ☐ Personal service. I personally delivered the *Objection to Production of Records* as follows:
 - (i) Name of person served:
 - (ii) Address where served:
 - (iii) Date served:
 - (iv) Time served:
 - (2) ☐ Mail. I deposited the *Objection to Production of Records* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 - (i) Name of person served:
 - (ii) Address:
 - (iii) Date of mailing:
 - (iv) Place of mailing (city and state):
 - (v) I am a resident of or employed in the county where the *Objection to Production of Records* was mailed.
3. My residence or business address is (specify):
4. My phone number is (specify):

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(TYPE OR PRINT NAME OF PERSON WHO SERVED)

(SIGNATURE OF PERSON WHO SERVED)

DECLARATION OF CUSTODIAN OF RECORDS

(In Compliance with *Evidence Code* Section 1561 and
Code of Civil Procedure Section 2015.5)

Title of Action: _____

Case Number: _____

Date Issued: _____

Date of Return: _____

Party Obtaining Subpoena: _____

Name of Business: _____

The undersigned declares:

1. I am the duly authorized custodian of records of the above-named business.
2. I have authority to certify the enclosed records.
3. The records were prepared by the personnel of the above-named business in the ordinary course of business at or near the time this Declaration was executed.
4. Check one of the following:

- ☐ The copies transmitted are true copies of all the original records described in the Subpoena.
- ☐ No copies or records are transmitted. The business does not have any of the records described in the Subpoena.
- ☐ The copies transmitted are true copies of part of the original records described in the Subpoena. The business does not have any other of the described records.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on _____, 2019, at _____, California.

Signature

Print Name



Summons and Subpoenas Department
PO Box 29728 S4001-01F
Phoenix, AZ 85038
Voice: 480-724-2000

BUSINESS RECORDS DECLARATION

I, Christine Perez, am over the age of eighteen and I declare that I am employed by Wells Fargo Bank, N.A. ("Wells Fargo") in the Summons and Subpoenas Department and am a duly authorized and qualified witness to certify the authenticity of the attached documents and/or information produced pursuant to the legal order. Wells Fargo reserves the right to designate another Custodian as it deems appropriate in the event an actual appearance is required concerning the records produced. I certify that the attached records:

- A) Were prepared by personnel of Wells Fargo in the ordinary course of business at or near the time of the acts, conditions or events described in the records; and
- B) It was the ordinary course of business for Wells Fargo employees or representatives with knowledge of the act, event, or condition recorded to make the record or transmit the information therein to be included in such record.
- C) The records attached are true and correct copies of the business records as maintained by Wells Fargo.

The records produced are described as follows:

Case number: 28674381

Document Type	Account #	Paper Count	Total Copies
Wire Automated	XXXXXX1892	0	0
Unable to locate any certified checks for the time frame requested.			
Wire Automated	XXXXXX0053	0	0
Unable to locate records within the time period requested.			
Certified Checks	XXXXXX0666	0	0
Unable to locate any certified checks for the time frame requested.			
Signature Cards	XXXXXX0666	3	3
Signature Cards	XXXXXX0053	4	4
Certified Checks	XXXXXX3966	0	0
Unable to locate any certified checks for the time frame requested.			
Deposits with offsets	XXXXXX1892	2	2
Certified Checks	XXXXXX8803	0	0
Unable to locate any certified checks for the time frame requested.			
Statements	XXXXXX3966	599	599
Certified Checks	XXXXXX0527	0	0
Unable to locate any certified checks for the time frame requested.			
Certified Checks	XXXXXX0053	0	0
Unable to locate any certified checks for the time frame requested.			
Certified Checks	XXXXXX0926	0	0

Case No: 28674381; Agency Case No: 17CHFL01344

Unable to locate any certified checks for the time frame requested.			
Deposits with offsets	XXXXXX0527	94	94
Statements	XXXXXX0926	146	146
Checks/Debits	XXXXXX0926	122	122
Wire Automated	XXXXXX8803	0	0
Unable to locate records within the time period requested.			
Wire Automated	XXXXXX0666	1	1
1099 - Wells Fargo	XXXXXX4547	0	0
Unable to locate any 1099 for the time period requested.			
Wire Automated	XXXXXX0527	3	3
Deposits with offsets	XXXXXX4547	213	213
Statements	XXXXXX8803	0	0
This account is included with statements for account XXXXXX3966			
Certified Checks	XXXXXX1892	0	0
Unable to locate any certified checks for the time period requested.			
Checks/Debits	XXXXXX0053	0	0
All transactions requested are electronic and no images are available			
Signature Cards	XXXXXX0926	6	6
Checks/Debits	XXXXXX0666	337	337
Statements	XXXXXX1892	10	10
Checks/Debits	XXXXXX8803	281	281
Deposits with offsets	XXXXXX8803	330	330
Signature Cards	XXXXXX4547	4	4
Signature Cards	XXXXXX8803	3	3
Certified Checks	XXXXXX4547	4	4
Checks/Debits	XXXXXX0527	44	44
Signature Cards	XXXXXX3966	3	3
Statements	XXXXXX0527	276	276
Checks/Debits	XXXXXX3966	0	0
All transactions requested are electronic and no images are available			
Checks/Debits	XXXXXX1892	0	0
All transactions requested are electronic and no images are available			
Wire Automated	XXXXXX4547	2	2
Wire Automated	XXXXXX0926	0	0
Unable to locate records within the time period requested.			
Signature Cards	XXXXXX1892	6	6

Statements	XXXXXX0053	0	0
This account is included with statements for account XXXXXX4547			
Deposits with offsets	XXXXXX3966	0	0
All transactions requested are electronic and no images are available			
Checks/Debits	XXXXXX4547	216	216
Signature Cards	XXXXXX0527	4	4
Statements	XXXXXX4547	499	499
Statements	XXXXXX0666	354	354
Deposits with offsets	XXXXXX0926	675	675
Deposits with offsets	XXXXXX0666	492	492
Wire Automated	XXXXXX3966	0	0
Unable to locate records within the time period requested.			
Deposits with offsets	XXXXXX0053	0	0
All transactions requested are electronic and no images are available			
Total Copies Delivered:			4,733

Additional comments:

The bank's standard record retention period is seven years.

I declare under penalty of perjury under the law(s) of the state of California that the foregoing is true and correct according to my knowledge and belief. Executed on this 10th day of November, 2023, in the City of Tempe, State of ARIZONA.



Subpoena Processing Representative

Image copies of requested transactions may be missing for the following reasons: Items not imaged, corrupted, blank, damaged, destroyed or not available, item(s) piggy-backed, electronic transaction(s). If the legal order requests certain types of loan information and other non-depository information, it was forwarded to other departments and they will respond to you directly.